

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**ELIZABETH SINES, ET AL.,**

Plaintiffs,

v.

**JASON KESSLER, ET AL.,**

Defendants.

Civil Action No. 3:17-cv-00072

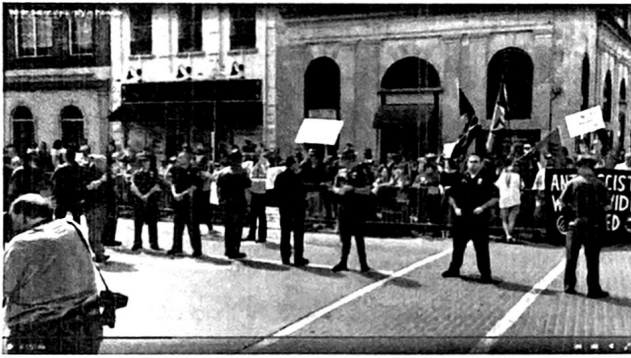
**DECLARATION OF MICHAEL HILL**

Pursuant to 28 U.S.C. § 1749, I, Michael Hill, state and declare the following on oath and under penalty of perjury:

1. I am over the age of eighteen (18) years old and am legally competent to make this Declaration.
2. The League of the South (the League) is a corporate entity, established for educational purposes, under Alabama state law. The League advocates for the southern US states to secede from the United states through lawful and peaceful means. The League also advocates for a return to a traditional, Christian-oriented Southern culture. Exhibit 6 and Exhibit 7 are pages that accurately describe these goals. As of 27 July 2020, the League has 237 paid members.
3. The League's founders intended for the League to be politically active; thus we did not seek 501(c)3 tax-exempt status from the Internal Revenue Service. The League views globalism, third world immigration, and the ongoing "civil rights" movement as a threat to Southern culture, history, and well-being. Thus, the League is active in politically opposing these trends.
4. I am a co-founder and President of the League.
5. I regularly post articles and statements on our League website that represent my personal opinions. I wrote both statements in Exhibits 8 and 9, using rhetoric alluding to political conflict with our opponents. There was little if any conflict at the events described in these articles.

League members, including officers, are free to disagree with my opinions, and are free to voice those opinions. Our members represent different viewpoints on a variety of issues.

6. I believe history shows that both black and Jewish organizations have been openly hostile to the League and our political views regarding the South. This includes the ADL, the SPLC, the NAACP, Black Lives Matter, and other groups. In my writings, I sometimes refer to these groups as “enemies” or “opponents.”
7. League members meet regularly to listen to speakers, to discuss political issues, and to rally/demonstrate publicly to get our ideas heard. Some of the locations the League has demonstrated include Vidalia and Calhoun, GA; Shelbyville and Murfreesboro, TN; Wetumpka, AL; Harrison, AR; Pikeville, Ky; and New Orleans, LA. League members have gathered on several occasions to protest the removal of monuments or flags representing Civil War-era figures or issues.
8. The League’s political adversaries regularly gather at League public events to oppose us and our activities. Before 2017, there were no physical confrontations at League public events. Both League members and our political opponents acted peacefully. There were no violent clashes and a large presence of law enforcement was not necessary. Beginning in 2017, larger and more violent and aggressive groups began to gather and oppose the League at our public events. Thus, law enforcement had a much larger presence. In Pikeville and New Orleans, law enforcement escorted League members to and from the venue and kept the two sides largely separated from each other. Violent opponents did target League members who became separated from our main group. For instance, in New Orleans, various isolated scuffles took place when some of our members found themselves separated from our main group. Exhibit 11 and Exhibit 12 correctly represent that the League protested at the times and locations described, the activity of law enforcement, and the presence of Antifa at those events. The video in Exhibit 11 accurately depicts the opposition in Pikeville, KY, including the screenshots below.



9. At some League events, I began to see some of our political opponents dressed in all black and carrying symbols that included red and black flags, images of two overlying flags, images of three arrows pointing downward, and a symbol with an “A” inside a circle. I distinctly remember these images from Murfreesboro, TN. I later learned that these symbols are commonly used by Antifa (Anti-Fascist Action). I also learned later that Antifa is a political movement comprised of loosely affiliated groups. From my study and observation, I learned that Antifa attempts to block access to events when they disagree with the viewpoint of the



speakers and violently attacks people trying to attend those events. I understand Antifa to be, in part, an anarchist movement, or at least it draws many anarchists to its ranks.

10. I have always required that our League officers make extensive plans, especially for security and logistics, when arranging our events. From about 2013 to 2017, League officers worked with local law enforcement to obtain permits to gather and for police protection, if needed. I always encouraged our League members to stay in groups and to coordinate lodging and travel plans in order to keep people together and to lessen the financial burdens of participating in events. Moreover, we coordinated plans for entering and exiting the event area safely, which included finding safe parking spaces for our members' vehicles. We also had a first aid staff on hand in case of heat exhaustion, illness, or injury to any of our members.
11. As president of the League, I always instruct our members to obey all laws, to follow the instructions of law enforcement, and to use force only in self-defense or in defense of others and their property, within the parameters of the law. Exhibit 15 and Exhibit 16 are a true and accurate representation of the instructions that I gave to League members prior to the Unite the Right rally.
12. I do not advocate the use of violence, except in self-defense. Rather, I promote change through the political process by legal and moral means. I wrote Exhibit 10, which accurately states that I do not desire physical conflict.
13. I made the decision for the League to be part of the Nationalist Front. I decided the League would join the Nationalist Front in order that we might deter future violence from Antifa and other political adversaries by having a larger group for public events. The groups in the Nationalist Front participated together in events in Pikeville and New Orleans prior to August 2017. Each Nationalist Front event was planned by a single participating organization and the other organizations were then invited to participate. There was no joint planning of an equal footing between any of the Nationalist Front groups. Law enforcement had a large presence at

both Pikeville and New Orleans. They actively separated opposing groups from League members; thus only isolated and minor scuffles took place.

14. The League did not plan, organize, contribute to, or officially attend any events in Charlottesville before August 2017. Neither I nor Michael Tubbs played any role in events in Charlottesville prior to August 2017.
15. I agreed for The League to participate in the Unite the Right rally in Charlottesville in August 2017 in order to show our support for keeping the statue of Gen. Robert E. Lee and to have an opportunity to spread our message to the public. I never learned of any plan to harm residents of Charlottesville or any peaceful group. I never heard of or knew of plans by the Rally's organizers to commit racial violence in Charlottesville. I never heard of any or knew of plans by any of my co-defendants to commit racial violence in Charlottesville.
16. My communications with Jason Kessler were strictly informational. At his request, I recommended speakers, but had no final say in who would speak or any other aspect of the planning for the Unite the Right rally. I spoke with Matthew Heimbach and Jeff Schoep on a few occasions. The conversations concerned the logistics of traveling to and from the rally safely. I had never met nor heard of James Fields until hearing about him in the news after the Unite the Right rally on August 12, 2017. I am not aware of any League officer who knew of James Fields before the car attack. Neither I nor any of my officers had contact with Richard Spencer, Andrew Anglin, Christopher Cantwell, Matthew Parrott, Robert "Azzmador" Ray, Nathan Damigo, Elliot Kline, Moonbase Holdings, LLC, Identity Europa, Augustus Sol Invictus, the Fraternal Order of the Alt-Knights, Michael Peinovich, the Loyal White Knights of the KKK, or the East Coast Knights of the KKK about planning the events of August 11-12, 2017.
17. Before August 2017, I and Ike Baker became dissatisfied with Kessler's planning process. We believed his plan to gather in McIntire Park and then go to Emancipation Park in small groups



would put our members in great danger of being attacked by Antifa, BLM, and their allies. We had seen stragglers attacked at previous events. I asked Ike Baker at that point to start making a separate plan of arrival and departure for the League. We both thought it would be much safer for all League members to arrive and depart as a group. Mr. Baker chose the Market Street parking garage as our gathering place because it is adjacent to a police station, Mr. Baker and I believed gathering there would deter our political opponents from confronting our members or vandalizing their vehicles when parked and left unattended. It was also only a short distance from the parking garage to Emancipation Park. The Traditionalist Workers Party and the National Socialist Movement agreed to join the League in our plan to travel to and from Emancipation Park.

18. While planning for the League to attend the Unite the Right rally, I learned that Antifa had plans to violently disrupt the rally. Based on observation and personal experience, both I and other League officers believed that Antifa, BLM, etc. would follow through on their plans and threats to violently oppose the Unite the Right rally. Even after I learned that Antifa had threatened to violently oppose the Unite the Right rally, I and other League officers believed that law enforcement would keep the two sides separated as they had done at Pikeville and New Orleans. We also believed that League members would be safe in a group. At most, we believed our members in attendance would have only to defend themselves against stray attackers who managed to elude law enforcement barricades. We felt that we should still attend the rally, because backing out would break a commitment and would amount to giving in to terrorist threats. We feared that backing out would encourage similar threats at future events.
19. After consulting Virginia state law and local law, we advised our members against carrying both knives and long guns to the rally.
20. I and my officers, and many League members, view Antifa and their allies as political enemies. They had tried to disrupt our lawful events before the Unite the Right rally, and a few isolated

scuffles took place at some of those events. We saw the rally in Charlottesville as an opportunity to defy them by publicly gathering, for me to give a speech, and for our members to disseminate the League's message and values. Exhibit 20, which I wrote, accurately represents these motives.

21. I condone the use of physical force for defensive purposes only. Some of our members do not shy away from defending themselves and others with defensive force.
22. I, and most League members, arrived in the Charlottesville area on the afternoon of Friday, 11 August 2017. Michael Tubbs arrived late on Friday, 11 August 2017. Most League members stayed at Seven Oaks, a retreat near Madison, VA. We had arranged this venue, outside of Charlottesville proper, for our members and their safety. Most League rally attendees were not from Virginia and were not familiar with the Charlottesville area. Many traveled long distances to get there.
23. The League's purpose for going to Charlottesville was to attend the United the Right rally on 12 August. We did not participate in the torch rally on the UVA campus on Friday, 11 August. It was never our intention to do so. We informed our members that if they did choose to attend the torch rally, they would be doing it on their own, and not as representatives of the League.
24. When we reached the Market Street parking garage on 12 August 2017, the leaders of each organization participating in our entry/exit plan was responsible for getting their own members in our column formation. I ordered our League members with shields to the front of the column. On our way down Market Street to Emancipation Park our opponents threw objects at our column and began falling in behind us as we progressed closer to the park. Unidentified rallygoers and opponents shouted insults at each other as we made our way to the park.
25. Before the League and our Nationalist Front allies got to Emancipation Park, other rallygoers were already in the southwestern quadrant of the park. Moreover, a large group of our political adversaries, especially Antifa and BLM, had occupied Market Street, south of the park. As our



column approached Emancipation Park from the east, we found our way into the park (the SE quadrant) blocked by a large hostile group of our political adversaries. Law enforcement was arrayed to the north of us, behind a line of barricades. and made no attempt to help us get into the park peacefully. Exhibit 35 at 6:25-6:43 and Exhibit 37 are accurate representations of our encounter with the group blocking entry to the park. Exhibit 39 at 8:03-8:13 is a true and accurate representation of the events depicted and shows oppositionists attempting to block rallygoers from moving up the road after the fighting has subsided. It also shows an oppositionist slapping at the rallygoers as they pass.

26. After our Nationalist Front column pushed through the blockade and entered Emancipation Park via the SE entrance, it did not push out into the crowd again. Michael Tubbs and I entered Emancipation Park with the rest of our group.
27. A crowd of press and oppositionists gathered in front of the SE entrance of Emancipation Park. It was impossible to tell which groups/ideologies they represented. Oppositionists in the crowd carried signs that called for violence against rallygoers. Many wore and carried Antifa imagery, including an "A" inside a circle, images of two overlapping flags, and an image of three arrows pointing downward. Exhibits 40 and 41 are true and accurate representations of signs that the opposition brought to the rally. I witnessed our political adversaries throw objects at rallygoers, including bricks, feces, paint, water bottles filled with urine, frozen water bottles, and chemical agents. Some of the rallygoers in the SE quadrant of the park threw some of these objects back into the crowd of opponents. Our opponents carried weapons, including sticks, rods, pepper spray, and makeshift flame-throwers. I saw fights break out in front of the SE entrance as late-coming rallygoers tried to enter the park.
28. Throughout our time in the park, most rallygoers socialized in the park and played no role in the conflicts outside.
29. League medics treated both rallygoers and members of the media inside Emancipation Park.



30. The rallygoer shield line staying in front of the SE entrance to the park until the governor declared an unlawful assembly. At that point, I ordered it to disburse and leave the park. I witnessed Michael Tubbs walking in front of the shield line and breaking up fights for most of the time we were in the park. I saw Michael Tubbs at the medic station twice, being treated for pepper spray from our opponents.
31. Throughout the morning, I saw law enforcement remain around the perimeter of the park and not intervene until they evicted rallygoers from the park after the governor declared an unlawful assembly.
32. I witnessed and experienced pepper spray, tear gas, and some other airborne substances that caused the crowds to disperse on several occasions.
33. When the governor declared the gathering an unlawful assembly, police outside the park ordered rallygoers to disperse. Both Michael Tubbs and I ordered League members to prepare to leave the park and head back to the parking garage. Police would not allow rallygoers to use the exits on the north side of the park. Rallygoers had to exit through the southern exits and the crowds of oppositionists. Fights broke out as the groups mixed but police did nothing to intervene. Most rallygoers walked west on Market Street and ended up at McIntire Park. As I headed west for McIntire Park, I witnessed numerous fights break out between rallygoers and oppositionists.
34. I believed that League members had a duty to speak up for what they believed and to keep their commitment to attend the rally. Because League members did these things, I believed the rally was a success. I was also proud that League members had defended others who were assaulted by Antifa, BLM, and other of our political opponents.
35. After the rally was declared an unlawful assembly, we gathered all our League members and went back to Seven Oaks. There, we ate and that night sat around a bonfire with other League members.

36. To the best of my knowledge, neither I nor Tubbs came into contact with any of the plaintiffs in this action. I am not aware of any League member who saw or came into contact with any of the plaintiffs.

37. The League continues to host rallies which are attended by League members. In October 2017 and January 2018, respectively, the League hosted rallies in Shelbyville, TN and Tallahassee, FL. At the Shelbyville and Tallahassee rallies, I gave the same sort of instructions to our members about obeying the law and using only defensive force. At Shelbyville and Tallahassee, a large number of law enforcement officers separated rallygoers from oppositionists, and no violent encounters took place. But rallygoers were confined to a small, enclosed area and couldn't interact with locals.

38. I, after consultation with other League officers, decided it was no longer safe or effective to hold announced rallies. Consequently, the League started holding "flash rallies" that involve gathering League members with very little notice. We chose this format to minimize the risk of violence from anarchists and to enable attendees to spread the League's message.

39. The League has since attended rallies in Knoxville, TN; Wetumpka, AL; and other locations. Few political opponents appeared at these events. No major conflicts have taken place at League rallies since August 2017. Exhibit 51 accurately describes the activity of law enforcement and lack of violent encounters that took place at the rally described. Exhibit 52 contains the instructions that I gave to League members before the rally described. Exhibit 53 accurately describes the Shelbyville rally. Exhibit 55 accurately describes the rally in Knoxville, TN.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this date: July 31, 2020



Michael Hill

Michael Hill